

RECEIVED

JAN 18 1983

H. M. PARKER

January 12, 1983

Mr. Hampton Parker  
Assistant Corporate Director  
Environmental Affairs  
Union Carbide  
Old Ridgebury Road  
Danbury, CT 06817

H. M. PARKER

Re: Leonard Chemical Company

Dear Mr. Parker:

The records of the South Carolina Department of Health and Environmental Control (DHEC) and of Leonard Chemical Company (Leonard) have identified your company as one of several who are believed to have sent wastes to the chemical recycling facility owned and operated by Leonard and located in South Carolina. Although Leonard has primary responsibility for the proper storage of waste chemicals and disposal of process residues, current environmental protection laws may impose liability on your company as a "Generator" for improper storage and disposal at the Leonard Chemical Company site.

As you may have been previously advised, Leonard was cited by DHEC for violation of the South Carolina Pollution Control Act and DHEC Regulations, specifically in the discharge of industrial solid waste without a permit. Subsequent to that citation in 1980 and following suspension of its permit to operate a hazardous waste facility, Leonard entered into an agreement with DHEC (Administrative Consent Order 82-18-SW dated 8/24/82), which permitted resumption of operation following clean up of the site. This condition for resumption of operation included both removal of certain materials and liquids contained in drums and a tank above the surface and measures with respect to chemical waste buried on the property.

DHEC has since asserted that Leonard failed to comply with the Consent Order. Some of the Generators were contacted by Leonard in an effort to obtain their assistance toward compliance, and on December 7, 1982, a meeting was held with most of the Generators, Leonard and DHEC to explore the situation and resolutions to the problem.

At the meeting, DHEC requested proposals from the Generators for clean up of the site, the proposals to be submitted by January 24, 1983. Subsequently, the Generators formed a working committee, whose members include the following:

Columbia Products Company  
General Electric  
Homelite Division of Textron Inc.  
Springs Mills, Inc.  
Transfer Fashion Print, Inc.

The purpose of the Generators' Committee is to coordinate the activities of the Generators and to provide to the Generators information that may lead to resolution of the problem without active participation by DHEC or EPA, i.e., resolution through a privately-financed clean up. The Committee's function is only for information-gathering and coordination and no authority is given or assumed to act on or for the Generators beyond this purpose.

Toward this end, the Committee is engaged in three principal activities: (1) development of proposals for clean up of the site, including clean up by outside contractors; (2) identification of DHEC and EPA requirements for clean up; and (3) development of proposals for cost allocation among the Generators, if the clean up is privately financed by the Generators.

With respect to the last item, the Committee is requesting your voluntary submission of the information identified on the attached form. Please recognize that furnishing this information is not an acknowledgment of liability or assumption of responsibility for removal of material or other clean up of the Leonard Chemical Company site. The data you provide is for informational purposes only, and the Committee will not release it without your specific authorization, in writing. In this regard, please send your information to Daniel G. Clodfelter, Esq., attorney for one of the Committee members, at the following address and by no later than January 17, 1982:

Moore, Van Allen and Allen  
3000 NCNB Plaza  
Charlotte, North Carolina 28280  
(704) 374-1300

Finally, the Committee expects you to maintain the confidentiality of this and subsequent communications among the Generators. Should you need additional information please contact any member of the Committee as identified on the attached list of Generators. It is anticipated that a meeting of the Generators will be held prior to January 24 and concerning which you will be advised.

Yours very truly,

LEONARD CHEMICAL GENERATORS' COMMITTEE

Certified-Return Receipt Requested  
cmk

Mr. Larry P. Bennett, Manager  
Plastic Laminate Systems  
P.O. Box 669071  
Charlotte, NC 28266

Mr. Barry Gilland  
Plant Manager  
Glas - Tec  
P.O. Box 309  
Gastonia, NC 28052

Mr. Paul Ludlow  
Plant Engineer  
Stanley Tools  
100 Stanley Road  
Cheraw, SC 29520

Mr. Clint Wall  
Plant Manager  
State Printing Company  
1210 Key Road  
Columbia, SC 29201

Mr. C. T. Johnson  
Harley Corporation  
P.O. Box 5497  
Spartanburg, SC 29304

— Mr. Nick Odom, Jr.  
Environmental Manager  
Springs Industries, Inc.  
P.O. Box 70  
Fort Mill, SC 29715

Mr. Monroe Lindler  
Engineering Director  
Columbia Products Company  
P.O. Box 4470  
Columbia, SC 29204

— Mr. Sloan Robinson  
Homelite Textron  
P.O. Box 7047  
Charlotte, NC 28217

Mr. James D. Loftin  
Transfer Fashion Print, Inc.  
P.O. Box 7007  
Charlotte, NC 28217

Mr. Tom Johnson  
Plant Manager  
Tartan Corporation  
P.O. Box 1176  
Hamlet, NC 28345

Mr. James T. Friss  
General Electric  
41 Woodford Avenue  
Plainville, CT 06062

Mr. David Kuta  
Inmont Corporation  
1255 Broad Street  
Clifton, NJ 07015

Mr. Hampton Parker  
Assistant Corporate Director  
Environmental Affairs  
Union Carbide  
Old Ridgebury Road  
Danbury, CT 06817

Mr. Bob Tucker  
Plant Manager  
Standard Chemical  
P.O. Box 34428  
Charlotte, NC 28234

Mr. Herb Klohnen  
Mobay Chemical  
P.O. Box 2855 CRS  
Rock Hill, SC 29730

Mr. Wayne Moore  
Plant Manager  
Rexham Incorporated  
P.O. Box 368  
Matthews, NC 28105

SURVEY OF  
CHEMICAL MATERIAL TRANSFERS  
LEONARD CHEMICAL COMPANY

Date on which you commenced business with Leonard Chemical Company \_\_\_\_\_.

Date on which you ceased business with Leonard Chemical Company \_\_\_\_\_.

Indicate below the type and quantity of material you transferred to Leonard Chemical Company for treatment, storage or disposal and/or returned to you from Leonard.

<u>YEAR</u>	<u>TYPE MATERIAL</u>	<u>QUANTITY SENT</u>	<u>QUANTITY RETURNED</u>

The furnishing of this information is not to be construed as acknowledgement of any liability or assumption any responsibility for removal of any material or other clean up of the Leonard Chemical Company site. This information is believed to be accurate and correct as based on currently available information, but is subject to change as further information is developed. This information is also to be preserved in the confidence of the Generators' Committee, to whom it is submitted.

Company \_\_\_\_\_

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

MOORE, VAN ALLEN AND ALLEN

ATTORNEYS AT LAW  
3000 NCNB PLAZA  
CHARLOTTE, N. C. 28280  
704-374-1300

RECEIVED

JAN 20 1983

C. L. DUDNICK

ENCLOSURE MEMO

FEDERAL EXPRESS

TO: Ms. Carol Dudnick  
Union Carbide Corporation  
Law Department E-3  
Old Ridgebury Road  
Danbury, CT 06817

FROM: Daniel G. Clodfelter

DATE: January 19, 1983

RE: Leonard Chemical Company

ENCLOSURES

Dear Carol:

Enclosed are papers prepared and presented to South Carolina DHEC and to the generators assembled at the meeting in Columbia on December 7. These were the papers from which the mailing list of possible generators was prepared. They are also, as I understand it, the source for Union Carbide's listing as a possible generator.

Please call if you have further questions. I will keep you posted on developments with regard to the January 24 date.

Sincerely,

MOORE, VAN ALLEN AND ALLEN

  
Daniel G. Clodfelter

DGC/jm

# LEONARD CHEMICAL CO., INC.

Chemical Reclaiming Specialists  
Chemical Consulting

520 SUMTER AVENUE  
ROCK HILL, SOUTH CAROLINA 29730

OFFICE: 803/328-6084

PLANT: 803/324-0306

November 10, 1982

Mr. Robert E. Malpass, Chief  
Bureau of Solid & Hazardous Waste Mgmt.  
S.C. Dept. of Health & Environmental Control  
2600 Bull Street  
Columbia, S.C. 29201

Dear Mr. Malpass:

Regarding your Administrative Consent Order 82-18-SW, we are requesting a delay in the time schedules as specified in items 6a and 8 (due Nov. 24) and item 5 (due Dec. 24). It will be financially impossible for us to meet these dates.

Due to circumstances dictated by the generally depressed state of our economy, we have been unable to sell a fair portion of the materials contained in the 1098 drums (referred to in item 1a). The companies with whom we had a market for these items at the time of signing of the consent order are associated with the building and/or textile industry, both of which are now severely depressed, and we have simply been unable to move these materials as we had anticipated. In addition, since we have been prohibited from reclaiming any materials not already on site, we have been unable to create any cash flow in those materials which are moving in the market place.

We have recently met with four of our largest customers; Homelite, Springs Industries, Columbia Products and Transfer Fashion Print, who are involved and concerned with our situation. We would collectively like to meet with you and John Jenkins to discuss our cumulative approach to this problem and offer what we consider a working solution and the steps by which we would accomplish that solution.

LEONARD CHEMICAL COMPANY, INC.

-2-

November 10, 1982

We anticipate the following individuals will represent their respective corporations at that meeting:

- Homelite - Sloan Robinson, Dir. Facilities Planning
- Springs Industries - Nick Odom, Environmental Mgr.
- Columbia Products - Monroe Lindler, Engineering Dir.
- Transfer Fashion Print - Jim Loftin, General Mgr.
- Leonard Chemical - Lawrence Leonard, President

The meeting will be held in the conference room at Columbia Products in Columbia, S.C. and we would like to offer you and Mr. Jenkins two alternate dates: Tues., Nov. 16 or Wed., Nov. 17 at a time convenient to you. Please advise us by phone as soon as you and Mr. Jenkins determine the date and time so that we in turn can advise the others involved.

Very truly yours,

*Lawrence K. Leonard*

Lawrence K. Leonard, President  
LEONARD CHEMICAL COMPANY, INC.

LKL/tl

cc: John Jenkins, DHEC  
Sloan Robinson, Homelite  
Nick Odom, Springs Industries  
Monroe Lindler, Columbia Products  
Jim Loftin, Transfer Fashion Print

*Changed to 11/22/82*

*10:30 DHEC*

*lims bby 4/12*

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## GENERATORS OF WASTE ON SITE

<u>Generator</u>	<u>Approx. Time Span</u>	<u>Material (Residue in material)</u>
Rexham Associates Corporation Matthews, N.C. Wayne Moore, Pl. Mgr. 704-847-9171	1967-1978	MEK, toluene, dioxane, Methylene chloride, poly- ester adhesive (printing ink, polyester res)
Homelite (Gastonia Plant) P.O. Box 7047 Charlotte, N.C. 28217 Sloan Robinson, Dir. Fac. Plan. 704-588-3200	1966-1982	MEK, VM&P naptha (paint solids)
Columbia Products Co. P.O. Box 4470 Columbia, S.C. 29204 Monroe Lindler, Eng. Dir. 803-754-7000	1968-1982	Acetone (polyester resin)
Springs Industries, Inc. P.O. Box 70 Fort Mill, S.C. 29715 Nick Odom, Jr., Environ. Mgr. 803-547-2901	1979-1982	MEK, Alcohol, Xylene Mixture Known as T-77 solvent (printing ink)
Transfer Fashion Print, Inc. P.O. Box 7007 Charlotte, NC 28217 704-588-3504	1979-1982	normal propyl & iso-propyl alcohol (Cellulose ester, ink pigments)
Plastic Laminate Systems P.O. Box 669071 Charlotte, NC 28266 Larry P. Bennett, Mgr. 704-394-1187	1979-1982	40 drums acetone (Polyester resin)
Glas - Tec P.O. Box 309 Gastonia, NC 28052 Barry Gilland 704-864-2674	1979-1982	acetone (polyester resin)
Stanley Tools Cheraw, SC 29520 Paul Judlow, Plant Eng. 803-537-9311	1980-1982	acetone (polyester resin)



# GENERATORS OF WASTE ON SITE

Page 2

Generator	Approx. Time Span	material (Residue in material)
Standard Chemical 600 Sugar Creek Rd. E. Charlotte, N.C. Bob Tuck, Plant Mgr. 704-597-1040	1975-1977	soaponified oils, soaps emulsions, nonhalogenat solvents.
General Electric Salisbury, NC Robert Waddell, Pl. Mgr. 704-637-5200	11/77 & 6/78	65 drums paint, water, fiber- glass filters
Inmont P.O. 7087 Charlotte, NC 28217 704-588-2020 Mr. Morassy	1966-1969	MEK, toluene, alcohol (ink pigments)
Tartan Boat Co. Hamlet, N.C. Frank Clements, Prod. Supt. Tom Johnson, Acting Pl. Mgr. 919-582-2147	1970-1980	acetone (Polyester resin)
State Printing Co. P.O. Box 1338 Columbia, SC 29202 Clint Wall, Plant Mgr. 803-799-9550	4/82	15 drums ethyl alcohol (printing ink)
Union Carbide Charlotte, NC	This plant closed	6 drums dichloro-benzene (Carbon)
The following companies are out of business:		
Corl Corp. Gastonia, NC <i>in business</i>	1976-1979	acetone (polyester resin)
Pargo, Inc. Charlotte, NC	1970-1977	acetone (polyester resin)
Hytec Charryville, NC	2-3 yrs.	acetone (polyester resin)
Electro-Motive Florence, SC	1974-1978	acetone, perchlorethane, 1-1-1 trichlorethane, terpentine

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PLANT: 803/324-0306

## INVENTORY OF MATERIALS ON SITE 12/1/82 (APPROX.)

<u>Quantity</u>	<u>Source</u>	<u>Material</u>
<del>600 Drums</del>	Electromotive Florence, S.C.	Terpentine, Perchloroethylene, 1-1-1 Trichlorethane, Acetone
<del>900 Drums</del>	Transfer Fashion Charlotte, N.C.	50/50 Mixture of normal propyl & isopropyl alcohol.
604 Drums	Rexham Corp. Matthews, N.C.	Mixture of printing inks (with a polyester base) in nonhalogenated solvent.
65 Drums	General Electric Salisbury, N.C.	Paint, water, fiberglass filters.
46 Drums	Mixed	Polyester solids.
610 Drums	Mixed	Still bottoms.
11 Drums	State Printing Columbia, S.C.	Ethyl alcohol
3 Drums	Union Carbide Charlotte, N.C.	Dichloro-benzene
Total Drums - 2839		

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PLANT: 803/324-0306

## ESTIMATED COST OF INCINERATING AND DISPOSING OF ON SITE WASTE BY LEONARD CHEMICAL COMPANY

### Installation of Incinerator:

Grading for concrete slabs	\$100.	
Gravel road extention to slabs	200.	
2 Concrete slabs 25' x 25', materials only	820.	
Labor for slabs	400.	
Crane time for placement of 2 major components	300.	
Flat bed truck to transport Homelite unit	200.	
Adaptation of incinerator, parts & pumps	3000.	
Construction labor	400.	
Allowance for maintainence and replacement parts	<u>1500.</u>	
Total installation cost		\$ 6920.

Incinerator expected to burn 24 drums of sludge and solids and 17 drums of liquids per 3-shift day. 54 days of burn are required for 1300 drums of solids and 900 drums liquids. Based on a 5 day week this equals 10½ weeks plus down time allowance for a total estimated burn completion of 12 weeks plus 4 weeks installation time.

### Labor costs for burn time:

60 days of 3 shifts of 2 employees ea. shift is 2,380 man hours @\$5./hr. plus 10% payroll taxes & 10% workmen's comp. \$17,280.

Disposal of ash and non-burnable materials (65 drums @\$35.) 2,275.

Lawrence Leonard's salary (@ \$24,000 annual rate) including payroll taxes and workmen's comp. for 16 weeks: \$ 8,861.

Total estimated cost \$ 35,336.

the Interim Status Standards for hazardous waste facilities.

NOW THEREFORE, IT IS ORDERED with the consent of Leonard Chemical Company that:

1) Leonard Chemical Company may resume operation of its activities associated with the transportation, treatment, storage, and disposal of hazardous wastes when the following have been performed:

a) Properly reclaim or dispose of all liquid contained in the 1098 drums of Turpentine, Perchloroethylene, and 1,1,1 Tri-Chlorethane addressed in Mr. Leonard's letter of May 27, 1982. Equivalent amounts of any on hand material may be substituted as long as the total number of drums mentioned above are disposed of. Such waste shall be transported and disposed of in accordance with all applicable regulations.

b) Leonard Chemical Company shall obtain financial responsibility for sudden and accidental occurrences in a minimum amount of one million dollars (\$1,000,000) with an annual aggregate of two million dollars (\$2,000,000), exclusive of legal defense costs for claims arising out of injury to persons, property, or the environment from the release of hazardous waste into the environment as specified in R.61-79.8H. Proper documentation of such financial responsibility must be submitted to the Department and such financial responsibility shall be maintained at all times.

c) All drums of hazardous waste on site which are leaking shall be transferred to good drums and all containers and tanks of hazardous waste shall be properly closed. When all such wastes have been recontainerized and such containers and tanks closed, the Department is to be notified and an inspection will be made to determine compliance.

When these conditions have been satisfactorily complied with, the Department will notify Leonard Chemical Company and its customers that the facility may resume operation.

2) Leonard Chemical Company shall, when operation is resumed properly, dispose of all hazardous wastes generated from the operation of the facility. Such wastes shall be disposed of within ninety (90) days of the date of generation. Upon operation, such waste shall be:

- a) Placed in containers which meet DOT Regulations for the waste involved;
- b) Labeled, marked, and placarded in accordance with DOT regulations, and;
- c) Permanently mark each container or package of hazardous waste using the

following words:

HAZARDOUS WASTE - South Carolina and Federal Law Prohibits Improper Storage or Disposal

Generator I.D. Code \_\_\_\_\_

Manifest Document Number \_\_\_\_\_

Date \_\_\_\_\_

The generator's identification code, the manifest document number, and the date the hazardous waste was placed in the container or package shall appear in the space following the words "Generator I.D. Code", "Manifest Document Number", and "Date", respectively. The marking shall be of the same color(s), approximate dimension(s), and material(s) used to make markings required by (b) above as specified in R.61-79.6E.

3) Leonard Chemical Company shall within thirty (30) days of the effective date of this Order have completed installation of the fence addressed and approved in the Department's letter of May 26, 1982 to Mr. Leonard.

4) Leonard Chemical Company shall ensure that all generators of wastes sent to the facility have complied with the prior authorization provisions of R.61-79.6C of the Department's Hazardous Waste Management Regulations.

5) Leonard Chemical Company shall within one hundred twenty (120) days of the effective date of this Order have completed a general clean-up and improvement of the site which shall include:

- a) Clearing of all underlying vegetation;
- b) Disposal of all scrap lumber, scrap metal, empty drums, and any other material which is not necessary to the operation of the facility;
- c) Remove and properly dispose of all contaminated soil and spilled hazardous waste not located in the burial area addressed in items 7 thru 12 below;
- d) Grade, contour, and stabilize the active portion of the facility so that run on of precipitation is eliminated and run off is directed away from all stored waste and the treatment area. Grading shall also provide suitable areas for storage of wastes; and,
- e) Segregate into like kinds all waste stored on site, store all waste in a proper manner, and not in direct contact with the ground. Provide identification of types of wastes stored in each area and ensure that any incompatible wastes are properly separated.

When completed, the site shall be maintained in a good and proper manner.

6) Leonard Chemical Company must address the accumulation and proper disposal of distillation bottom wastes that are presently on site and that which will be generated when operation is resumed. In order to address this problem, Leonard Chemical Company shall, within thirty (30) days of the effective date of

this Order, submit to the Department an accurate inventory of all drums of distillation bottoms now on site and shall accomplish one of the following options:

a) Apply for a construction permit for a new incinerator within ninety (90) days of the effective date of this Order by submitting a properly completed permit application to the Department which shall meet all Federal and State requirements within one hundred and twenty (120) days after receiving the Departmental permit, complete construction of such incinerator and begin disposal of distillation bottom wastes at a rate of at least one-twelfth (1/12) per month of the total number of drums accounted for in the inventory submitted above.

b) If Leonard Chemical Company chooses not to comply or fails to comply with (a) above, begin disposal of distillation bottoms at an approved off-site facility within ninety (90) days of the effective date of this Order. Disposal shall be at the same rate specified in a) above.

If for any reason the Department denies the permit application in (a) above, Leonard Chemical Company shall begin disposal of distillation bottom wastes within thirty (30) days of notification of such denial. Disposal shall be at the same rate specified in a) above.

7) Leonard Chemical Company shall within thirty (30) days of the effective date of this Order have completed proper installation of the third monitoring well at the top of the hill on the opposite side of the entrance road from the burial area.

8) Leonard Chemical Company shall within ninety (90) days of the effective date of this order, file with the Department analytical results of samples taken from the three wells on site. The samples shall be analyzed for the following:

Volatile organics	Iron	Lead
COD	Nickel	Arsenic
TOC	Copper	Total dissolved solids
pH	Zinc	Chlorides
Chromium	Cadmium	
Manganese	Mercury	

Also, file with the analysis results, a report giving the details on the construction of each well, including the depth to the water table in each. Water table depth shall be in relation to an established bench mark. Form HDI (9-77) of the Hydrology Division of the Department may be used to report this information.

The Department shall be notified at least one week prior to the sampling of these wells in order that Department personnel can be present and split samples.

Leonard Chemical Company shall ensure that samples are properly collected,

preserved, and immediately delivered to a certified lab for analyses. Also, Leonard Chemical Company shall provide to the Department written documentation of such procedures prior to their use.

9) Within thirty (30) days of receipt of all information required in item 8 above, the Department will notify Leonard Chemical Company in writing as to its decision on the disposition of the chemical waste buried on the property.

10) If the Department finds the waste must be removed, all chemical waste buried on the property shall, in accordance with a written plan and timetable to be submitted to and approved by the Department and made an amendment to this Order, be removed and properly disposed of. Such plan shall be submitted within thirty (30) days of written notification from the Department.

11) If the Department finds that the chemical waste may remain buried on the property, within one hundred eighty (180) days of the date of this determination, the burial site shall be closed in accordance with the following conditions:

a) All chemical waste shall be consolidated and compacted at the upper end of the burial site;

b) Two feet of well compacted earth shall be placed over the chemical waste. This cover shall be graded to conform with the surrounding contours of the area or in such other manner to prevent ponding of water on or erosion of the area. The site shall be maintained at all times in such a manner to ensure two feet of compacted earth over the area.

12) If the Department finds that the chemical waste may remain buried on the property, Leonard Chemical Company agrees to perform routine sampling of the wells around the site to monitor for any future contamination of groundwater from the burial site. The details of such a monitoring program would be as approved by the Department. Detection of groundwater contamination at a future date will require the material to be removed and other remedial actions undertaken.

13) Leonard Chemical Company shall within ninety (90) days of the effective day of this Order ensure compliance with all the following Interim Status Standards of R.61-79.11 of the Department's Hazardous Waste Management Regulations:

a) General waste analysis plan and analyses as required by R.61-79.11 B(3);

b) A written inspection schedule and log as required by R.61-79.11 B(5);

c) Personnel training and records as required by R.61-79.11 B(6);

d) Equipment as required by R.61-79.11 C to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste;

e) A Contingency Plan and Emergency Procedures as required by R.61-79.11 D;

f) Recorded data as outlined in R.61-79.3 D and required by R.61-79.11 E; and,

g) Closure Plan as required by R.61-79.11 G.

Leonard Chemical Company acknowledges that it is aware that its hazardous waste facility will be required to meet all State and Federal requirements in order to obtain fully permitted status when such requirements become effective.

Upon the date this Order is signed by Mr. Leonard, the Department shall vacate Order 82-07-SW. Mr. Leonard is aware that this Order must be placed on Public Notice for thirty (30) days. If no significant public comment is made during the thirty (30) day period, this Order will become effective when signed by the Commissioner for the Department.

It is further ordered and agreed that failure to meet provisions or deadlines of this Order shall be deemed a violation of the Hazardous Waste Management Regulations and the Pollution Control Act and shall be deemed unlawful. Upon ascertaining any such violation, appropriate action shall be promptly initiated to obtain compliance with the provision of the Order and the aforesaid Acts.

THE SOUTH CAROLINA DEPARTMENT OF  
HEALTH AND ENVIRONMENTAL CONTROL

By: Robert S. Jackson  
Robert S. Jackson, M.D.  
Commissioner

August 24, 1982

Columbia, South Carolina

WE CONSENT:

LEONARD CHEMICAL COMPANY, INC.

Lawrence K. Leonard  
Lawrence Leonard

DATE: 6/25/82

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Robert E. Malpass  
Robert E. Malpass, Chief  
Bureau of Solid & Hazardous Waste Management,

DATE: 6/25/82

Dennis N. Cannon, Jr.  
Dennis N. Cannon, Jr., Attorney for  
South Carolina Department of Health  
and Environmental Control

DATE: 6/28/82



Tyler Leonard

2:44

1-803-325-6084

12/1/82

1. HOME LITE = 1966-1982 - TIEK, VMP NAPP  
PINK SOLIDS -

2. COLUMBIA PROD. 1968-1982 - ASA TONER  
POLY RES.

3. SPRING 1978-1982 - TIT CO-UNIT  
(MEX - ALCOHOL - XYLENE) PRINTING INK

4. TRANSFER FACILE PRINT IN PROPS CO PA  
ALCOHOL DIRT INK

5. REX HAT 1967-1978 - MEX TOLY  
DIOXANE TIT CHLOR & POLY ADI  
PRINTING INK & POLY RES.

6. PLASTIC LAMINAT SYSTEMS 1979-1982 - 40 DWR  
ASA TONER POLY RES,  
LAMP BURNING -

7. GLASSER CRISTONIA 1979-1982  
ASA TONER POLY RES.

8. STANLEY ZOOCS

1980-1982

ASTOR

ETH. ACRYLATE

---

9. STANDARD CHEMICAL CO.

1975-1977

10 DWTs - 20 DWTs STILL BOTTOM

10. GENERAL ELECTRIC

1977-1978

65 DWT

STILL ON HAND

PAINT-WATER-FLAM

CLASS FILTER

11. INTRON

1966-1969

12 DWTs

ALCOHOL

70% INK DILUTION

(STILL BOTTOMS IN LAND FILL)

12. TARTON BONT CO.

1970-1980

ASTOR

POLY RES.

13. STARR PAINTING CO.

12 DWTs OF ETHYL ALCOHOL

RES. PRINTING INK

14. UNION CARBIDE - 3 DRAWS  
DYE CHILD BURNING RE. CARBON

APR 2003 CORL GASTONIA - 1976-1979 AIR TONR  
POLY RES.

PANCO CHAMOTTE 1970 - 1977 AIR TONR  
POLY RES.

HITC CHAMPVILLE ASTON  
POLY RES.

ELECTRO MOTIVE ELONVILLE 1970-1977  
ASTON PER CLON. PTH. III. TR CLON  
PTH. TR PANTINE

South Carolina  
Department of  
Health and  
Environmental  
Control

RECEIVED DEC - 2 1982

BOARD  
J. Lorin Mason, Jr., M.D., Chairman  
Gerald A. Kaynard, Vice-Chairman  
Leonard W. Douglas, M.D., Secretary  
Oren L. Brady, Jr.  
Moses H. Clarkson, Jr.  
Barbara P. Nuesle  
James A. Sprulli, Jr.

COMMISSIONER  
Robert S. Jackson, M.D.  
2600 Bull Street  
Columbia, S.C. 29201

November 29, 1982

Mr. James D. Loftin  
Transfer Fashion Print, Inc.  
P. O. Box 7007  
Charlotte, NC 29217

RE: Leonard Chemical Company - York County

Dear Mr. Loftin:

As requested during our meeting on November 23, 1982, please find enclosed a list of companies believed to have sent wastes to the above referenced facility. Exact quantities of wastes sent by each company are not known at this time. The list includes all available information on each company. We are requesting Mr. Leonard to review the list and provide any additions or deletions that may be necessary.

In addition a copy of estimates for disposal and transportation of wastes at the Leonard site is enclosed. These estimates are for your decision making purposes only and final costs may be different. Costs do not include work which will be required on site.

If you have any questions, please contact me at (803) 758-5681.

Sincerely,



Ted Buchanan, Manager  
Compliance and Enforcement Section  
Bureau of Solid and Hazardous  
Waste Management

JTB:als

enclosures

cc: Boyce Faulkner

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SCA Services - Pinewood, South Carolina  
Contact: Charlie Roundtree

(803)452-5003

*exclusive of  
analytical  
costs  
no overhead*

Drums: \$30 each  
Contaminated soil and bulk solids: \$65 per cubic yard  
Transportation approximately \$400 per truck load

Waste Management of Alabama (205)652-9531  
Contact: Mark Gregory

~~Drums: \$39 each~~  
Contaminated soil and bulk solids: \$34 to \$39 per ton  
Transportation: \$2.85 per loaded mile

ABCO - Roebuck, South Carolina (803)576-6821  
Contact: Jim Gregory for transport  
Bob Blume for treatment

Generally handle only bulk liquids \$.05 per pound for easily  
handled material. No estimate given for transportation.

*dependent on BTU's; chlorides*

Industrial Chemical Company - Rock Hill, South Carolina (803)327-5276  
Contact: Mrs. Neal

Handle only liquids  
Drums: \$35.00 each for transportation and incineration

*\$135/drum quote from Maryland*

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Mr. Larry P. Bennett, Manager  
Plastic Laminate Systems  
P. O. Box 669071  
Charlotte, NC 28266  
Phone: 704-394-1187

Mr. Barry Gilland  
Plant Manager  
Glas - Tec  
P. O. Box 309  
Gastonia, NC 28052

Mr. Paul Ludlow  
Plant Engineer  
Stanley Tools  
P. O. Box 190  
Cheraw, SC 29520

Mr. Allen Gordon  
Maintenance Superintendent  
State Printing Company  
1305 Sumter Street  
Columbia, SC 29201

Mr. C. T. Johnson  
Harley Corporation  
P. O. Box 5497  
Spartanburg, SC 29304

Mr. Nick Odom, Jr.  
Environmental Manager  
Springs Industries, Inc.  
P. O. Box 70  
Fort Mill, SC 29715

Mr. Monroe Lindler  
Engineering Director  
Columbia Products Company  
P. O. Box 4470  
Columbia, SC 29204

Mr. Sloan Robinson  
Homelite  
P. O. Box 7047  
Charlotte, NC 28217

Mr. James D. Loftin  
Transfer Fashion Print, Inc.  
P. O. Box 7007  
Charlotte, NC 28217

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Tartan Corporation  
Hamlet, North Carolina

Carl Corporation  
Gastonia, North Carolina

General Electric  
Salsbury, North Carolina

Thiokol-Rexham

Inmont Corporation  
Charlotte, North Carolina

Union Carbide  
Charlotte, North Carolina

Standard Chemical  
Charlotte, North Carolina

Electro-Motive  
Florence, South Carolina

T & F Plastic  
Gaston, South Carolina

Athens Marble  
Salsbury, North Carolina

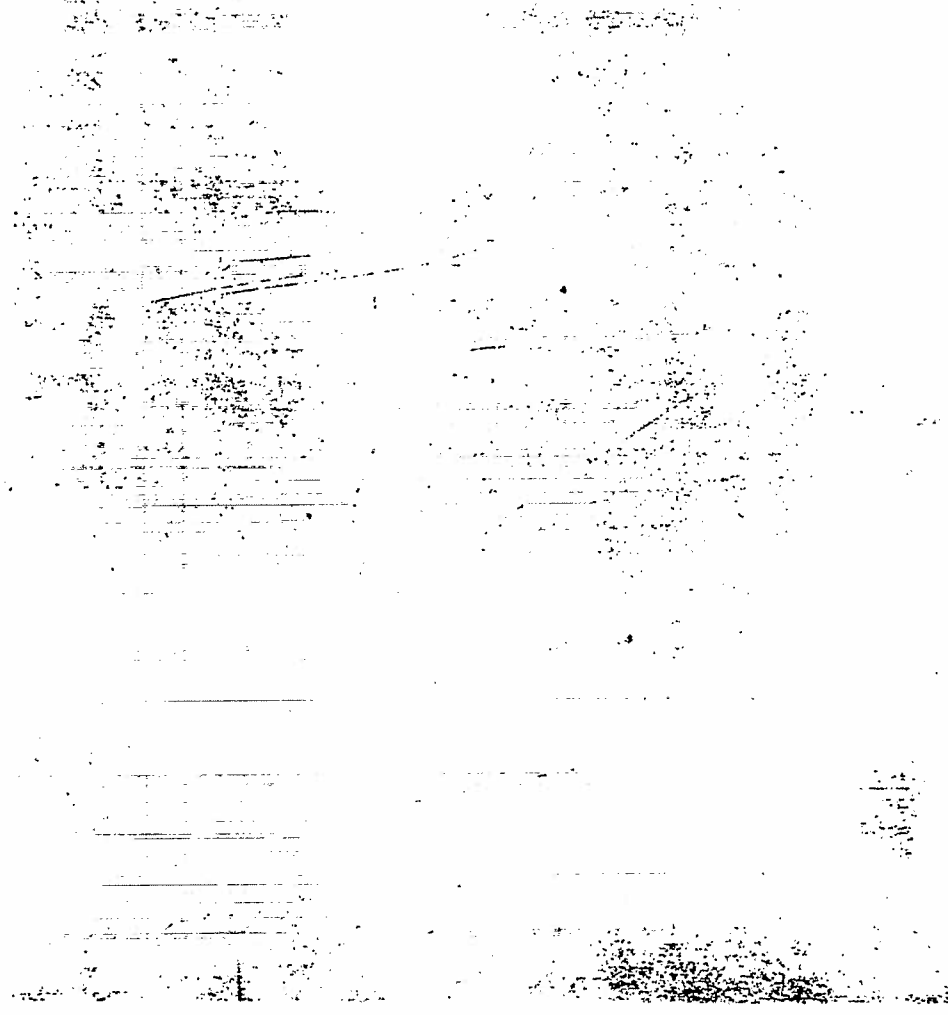
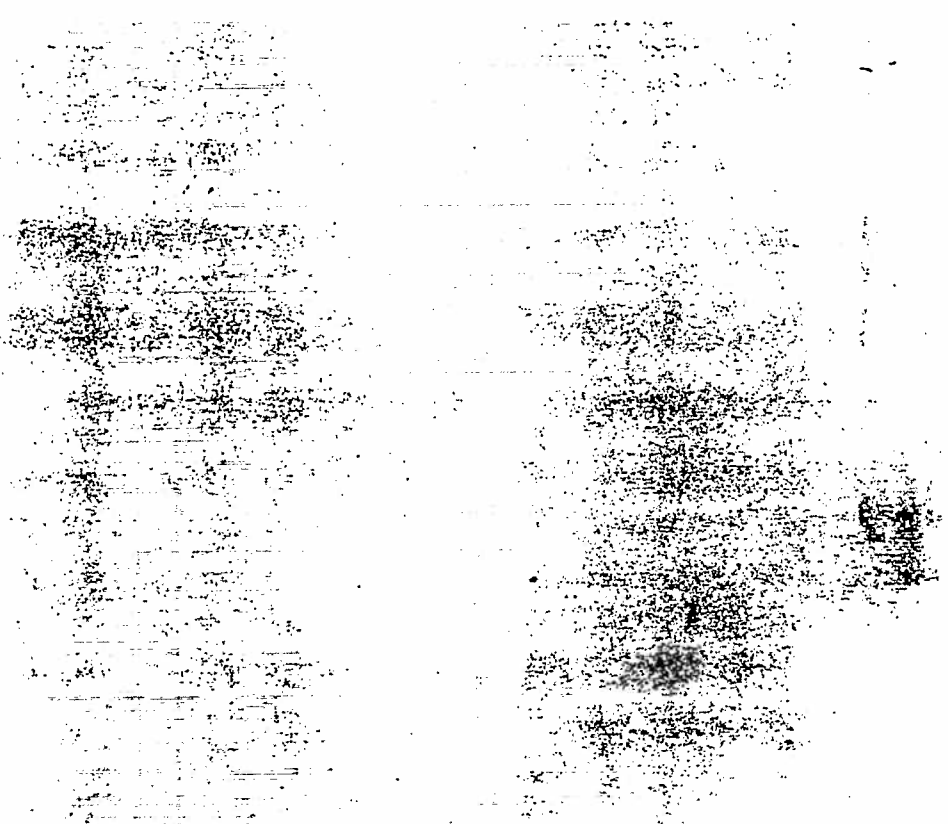
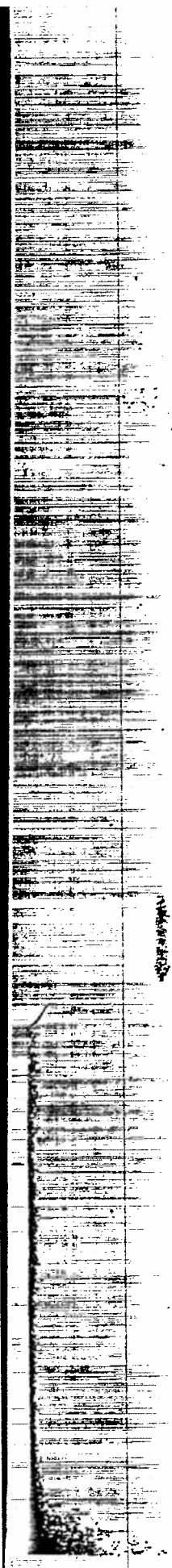
Twentieth Century

Verona Dyestuff  
Rock Hill, South Carolina

Rexham Incorporated  
Pineville, North Carolina

Waro-LaFrance  
Raleigh Street  
Charlotte, North Carolina

Piedmont Manufacturing  
York, South Carolina





**Springs**

Springs Industries, Inc.  
P. O. Box 70  
Fort Mill, S. C. 29715

803-547-2901

FEB 24 1983

C. L. DUDNICK

*Copy to  
H. H. Palmer  
D. M. Nash  
B. H. Lovelace*

February 16, 1983

CERTIFIED MAIL

Mr. Hampton Parker  
Assistant Corporate Director -  
Environmental Affairs  
Union Carbide Corporation  
Old Ridgebury Road  
Danbury, CT 06817

Gentlemen:

Thank you for your cooperation in returning the survey form sent to you by the Generators' Committee. Responses have been received from all sixteen companies contacted. Two of the companies contacted have replied that their records do not reveal any dealings with the Leonard Chemical Company. Forms received from the other fourteen companies indicate that a total of approximately 6,000 drums of hazardous wastes were sent to Leonard during a period ending in 1982.

At a meeting on February 10, 1983, the Generators' Committee discussed the survey results and several proposals for cost allocation. Among the proposals considered was the method that has been used by the U.S. Environmental Protection Agency (EPA) in cleaning up hazardous waste disposal sites. The EPA computes the quantity of wastes shipped to the site during all its years of operation and determines each generator's share accordingly. For example, if your company shipped 300 drums to Leonard, the EPA would consider that your company has a 5 percent share of the cleanup costs.

So far, two bids for site cleanup have been received by the Committee - Chemical Waste Management has returned a bid of \$287,313 for surface cleanup only and a bid of \$42,075 for landfill cleanup. Triangle Resource Industries has returned

a bid of \$248,789 for surface cleanup and \$85,000 for landfill cleanup.

The Generators' Committee will meet again on February 25, 1983 at the Homelite offices to discuss other bids for cleanup and proposals for cost allocation. Please consider whether you are willing to participate in the site cleanup, either on the basis of the EPA cost allocation method or on some other basis.

Please send your reply so that it will be received no later than February 25, 1983 to:

Phyllis W. Long, Esquire  
Springs Industries, Inc.  
P. O. Box 70  
Fort Mill, S.C. 29715

Yours very truly,

The Generators' Committee

PWL/sjm